

Group reserves its right to withdraw Phase II claims or make additional Phase II claims in response to rulings of the Copyright Office or Copyright Royalty Judges, the outcome of the 2010-12 and 2013 distribution proceedings, the acquisition of additional evidence, or the filings of additional claimant parties.

With respect to the Phase II distribution of royalties within the 2013 Commercial Television royalties, the Broadcaster Claimants Group is unaware of any controversy at this time.

C. Consolidating Proceedings

The Broadcaster Claimants Group believes it is advisable to consolidate multiple royalty years into a single distribution proceeding and would not object to having Phase I controversies for all years 1999-2005 resolved in a single proceeding.

Respectfully submitted,

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January 21, 2015